



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 19, 2020

**By ECF and By E-Mail (w/ Encl.)**

Honorable Rachel P. Kovner  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Chunn, et al. v. Warden Derek Edge*, Civil Action No. 20-cv-1590  
(Kovner, J.) (Mann, M.J.)

Judge Kovner:

Pursuant to the Court's discussion regarding the production of sick call requests during the preliminary injunction hearing (Tr. 16-17), Respondent respectfully submits the following supplemental documents:

- Declaration of Cdr. Scott A. Griffith, MSN, RN-BC and attached "Activities Report" (Bates numbered BOP SCR 1211-1257); and
- Third Supplemental Declaration of Health Services Administrator Stacey Vasquez and paper sick call requests (BOP SCR 1258-1316).

Respondent only files the Declarations on the docket at this time. The documents attached to the Declarations—the "Activities Report" and the paper sick call requests—will be emailed to Your Honor contemporaneously with this filing. Respondent respectfully requests that the Court supplement the record to include the aforementioned Declarations and documents. Respondent intends to reference these documents in his Proposed Findings of Fact. Copies of these documents have been provided to Petitioners as well.

Respondent thanks the Court for its consideration of this matter.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: \_\_\_\_\_ /s/

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Enclosures

cc: All Counsel of Record (By ECF)